

To: Reeves, Bruce@DOC[Bruce.Reeves@conservation.ca.gov]
From: Moffatt, Brett
Sent: Fri 8/1/2014 7:47:16 PM
Subject: RE: Kern Front - Santa Margarita - Produced Water Injection Wells

Bruce,

I will review the attachments and get back to you shortly. I have another matter to deal with first.

Brett

Brett Moffatt
US EPA, Region 9
(415) 972-3946

-----Original Message-----

From: Reeves, Bruce@DOC [mailto:Bruce.Reeves@conservation.ca.gov]
Sent: Friday, August 01, 2014 12:26 PM
To: Moffatt, Brett
Subject: FW: Kern Front - Santa Margarita - Produced Water Injection Wells

Brett,

Oxy is asserting the 1985 letter, attached ("AE Material....pdf") as a basis for continuing to inject.

I'd appreciate a chance to discuss this with you if you are in today.

BR

-----Original Message-----

From: Adam_Smith@oxy.com [mailto:Adam_Smith@oxy.com]
Sent: Friday, August 1, 2014 9:52 AM
To: Reeves, Bruce@DOC
Subject: FW: Kern Front - Santa Margarita - Produced Water Injection Wells

Bruce:

On April 9, 2014, Vintage/Oxy received two disposal permits for Kern Front Santa Margarita injection wells with a note that the permits only authorized drilling and that completion and injection would be permitted following approval of a USEPA aquifer exemption. Since that time we have provided the 1983 letters from DOGGR below and I understand you already have the attached 1985 EPA. All clearly indicate that the Santa Margarita is exempt.

The local office has deferred these matters to "Sacramento," which I assume means you. Are you available to discuss later today or early next week? I will make myself available any time that works for you. You can also call me directly at (310) 443-6951 or (661) 431-0845.

Thanks,

Adam

From: Smith, Adam
Sent: Thursday, July 24, 2014 4:36 PM
To: Bohlen, Steven@DOC; Marshall, Jason@DOC; 'Pierce, James@DOC'

Cc: 'Jeff Sievers'
Subject: FW: Kern Front - Santa Margarita - Produced Water Injection Wells

All:

Please see the documents below, clearly demonstrating that the Kern Front Santa Margarita is exempt.

If you have any questions, please do not hesitate to contact me at (310) 443-6951 or (661) 431-0845.

Regards,

Adam

From: Hayat, Omar
Sent: Wednesday, July 23, 2014 1:40 PM
To: Smith, Adam
Cc: Haney, Kenneth; Gillespie, William J.
Subject: FW: Kern Front - Santa Margarita - Produced Water Injection Wells

FYI

From: Hayat, Omar
Sent: Wednesday, July 23, 2014 1:39 PM
To: 'dan.wermiel@conservation.ca.gov'
Cc: Fields, Steve@DOC; 'Penderel, Bill@DOC'
Subject: Kern Front - Santa Margarita - Produced Water Injection Wells

Dear Mr. Wermiel

On 3/25/14 Vintage Production requested permits to drill two produced water injection wells in Kern Front field in Santa Margarita pool under UIC Project No. 33800020.

Our request was approved by your office on 4/9/14 with the note that the permit authorizes drilling only and injection will be permitted following approval of USEPA aquifer exemption for the Santa Margarita zone and that a supplementary notice is required before completion. See attached the two permits for wells WD4 and WD5 in Sec 23, T28S, R27E in Kern Front.

We have researched our records and have come across correspondence between DOGGR and ARCO Oil, then operator of Kern Front field, which we believe clearly shows that an exemption was issued by EPA for Santa Margarita in Kern Front in June 1983 after an appeal by DOGGR.

I have attached the letters for your review.

Given this documentation we do not think there is a need to go through the exemption process again and we request that you remove the condition from the drilling permit.

We look forward to receiving revised drilling permits from your office as we have rig commitments to drill these wells this year.

Regards

Omar Hayat
Reservoir Management Team Lead - Kern Front
9600 Ming Avenue, Suite 300, Bakersfield, CA 93311
Phone: 661-412-5489